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Kenneth Rust

Director Federal Regulatory Matters EX PARTE OR LATE FILED

NYNEX

April 16, 1997

Ex Parte

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. - Room 222 Washington, D.C. 20554

Federal Communications Commission Office of Socretary

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Re: CC <u>Docket No 96-262</u>

Dear Mr. Caton:

Today, Frank Gumper, representing NYNEX, Bruce Cox, representing AT&T, and Ed Lowry and Alan Mettler, representing Bell Atlantic, met with Thomas Boasberg, Legal Assistant to Chairman Hundt, regarding the item captioned above. The attached material on the joint AT&T/Bell Atlantic/NYNEX proposal for access reform, already a part of the record in this proceeding, was used during the presentation and ensuing discussion, during which the representatives elaborated and clarified information contained in the attached.

Any questions on this matter should be directed to me at either the address or the telephone number shown above.

Sincerely,

Attachment

cc: T. Boasberg (letter only)

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NYNEX Recycles

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Edward D. Young, IIIVice President - External Affairs and Associate General Counsel

April 14, 1997

EX PARTE

Mr. William Caton Acting Secretary Federal Communications Commission 1919 M Street, NW - Room 222 Washington, DC 20554

Re: CC Docket Nos. 96-45 and 96-262

Dear Mr. Caton:

On April 4, 1997, AT&T, Bell Atlantic and NYNEX outlined a proposal to achieve interstate Universal Service and access charge reform. The attached charts and spreadsheets show the effects of that proposal on the industry and on long distance carriers, local carriers, and consumers. Attachment 5 contains a detailed implementation schedule.

In developing this proposal, the companies focused on five goals:

- Continue historic Universal Service requirements while increasing Universal Service support for rural telephone service
- Fully fund the new education and health care components of Universal Service
- Reduce telephone rates for consumers
- Reduce access rates
- Minimize the risk of a successful legal challenge to the plan

The proposal put forth by AT&T, Bell Atlantic and NYNEX successfully achieves these five goals.

The plan would continue to provide support for basic local telephone service at affordable rates. Also, rural telephone companies would receive additional Universal Service funds to lower their interstate access charges.

The proposal provides funding for inside wiring and advanced telecommunications services for schools and libraries and discounts for telephone service to rural health care facilities. These are significant new federal programs required by the 1996 Telecommunications Act. The funding required for these new programs would be financed in part through a 75¢ Universal Service for America Contribution by telephone customers.

phased in for residential customers through 25¢ increases every six months. The contribution could be reduced after all facilities are connected.

Another highlight of the plan is that consumers would enjoy a net \$900 million reduction in telephone charges over the next 18 months, even after taking into consideration their modest contribution to support Universal Service.

Effective July 1, 1997, the access charges that local telephone companies now receive from long-distance carriers for use of the local telephone network to begin and complete long-distance calls will be cut by \$2.5 billion. This represents a significant reduction in access rates by local companies including Bell Atlantic and NYNEX. Long distance companies led by AT&T, after making their required contribution to Universal Service, would reduce long distance customer rates by over \$2 billion.

If all industry participants and the Commission support this balanced compromise, the uncertainty and delay inherent in further litigation of these issues can be avoided.

We encourage other participants in this process to review this proposal and consider supporting it. We believe it balances the interests of all telecommunications providers and the public we serve.

We request that the attached be made part of the record in the proceedings captioned above.

Sincerely,

Edward D. Y

Attachment

cc: Chairman Reed E. Hundt

Commissioner James H. Quello

Commissioner Rachelle B. Chong

Commissioner Susan Ness

Mr. James Coltharp

Mr. Daniel Gonzalez

Mr. James Casserly

Mr. Thomas Boasberg

Ms. Regina M. Keeney

Mr. A. Richard Metzger, Jr.

Ms. Kathleen B. Levitz

Mr. John Nakahata

Mr. Joseph Farrell

Mr. James D. Schlichting

Mr. Richard K. Welch

ATT/Bell Atlantic/NYNEX Interstate Proposal

Overview

On April 4, 1997 AT&T, NYNEX, and Bell Atlantic provided a detailed outline of an interstate proposal to achieve Universal Service and access charge reform. Attached are charts and spread sheets that display estimates of the quantitative effects of that proposal. These attachments demonstrate how the plan will result in the following benefits (Attachment 1):

- toll reductions to consumers,
- full funding of the Joint Board recommendations to connect schools, libraries, and rural non-profit health care providers,
- increased support for rural local exchange carriers to allow them to reduce access charges and maintain affordable rates, and
- increased support for Lifeline and Linkup programs.

Attachment 2 displays the first year access revenue reductions for each price cap local exchange company and illustrations of potential cumulative 5 year impacts. The results of this analysis show that the cumulative impacts are well balanced and equitable. The combination of a one time initial rate reinitialization based upon reported interstate costs and a five year phase out of the TIC rate element are the primary factors in creating this balanced impact.

In the first year, companies will apply their revenue reductions initially to their TIC. This reduces the amount of TIC remaining to be phased out in subsequent years. For some companies there would be no TIC remaining to phase out after the first year and thereafter their price changes would reflect normal price cap/access adjustments. Conversely, companies like NYNEX would reduce rates by \$156 million in year one under rate reinitialization and would still be obligated to reduce rates by at least \$97 million per year in subsequent years in order to phase out their remaining TIC.

Attachment 3 displays the impact that this proposal will have on the average access usage rate for each price cap company. The industry average usage rate will decline from 2.7 cents per minute-of-use today to approximately 1.5 cents per minute-of-use on January 1,1998. Further reductions are guaranteed as some companies continue to phase out their TIC in July 1998 and annually in each of the following three years.

Attachment 4 provides a summary of the Universal Service Funds that are supported by this plan. It shows the estimated total size of the funds when fully

in place, the amount of each fund that would be recovered from IXCs, LECs, and other carriers, and, for the IXCs, it shows the amount of their new funding obligation compared to what they pay today through Universal Service and access charges. The total size of the fund is \$5.36 billion (based upon more accurate high cost information). Of that amount, \$3.3 billion is new money not currently funded through either Universal Service payments or access charges.

Attachment 5 explains the universal service and access rate structure changes proposed in the plan and the impact of those changes. In addition, Attachment 5 also describes the implementation timeline under the proposal. The plan will substantially realign the interstate reported access costs and rates by increasing the proportion of non-traffic sensitive costs that LECs will recover through flat rate charges. This means that usage charges will be better aligned with variable (traffic sensitive) costs.

Attachment 6 lays out the various changes being proposed across a timeline and demonstrates how the plan will impact IXCs, LECs, and consumers. The major milestone dates for this plan are:

- July 1, 1997 when access and toll reductions are implemented and the first changes to Universal Service are initiated for new programs to support schools and libraries;
- January 1, 1998 when access charges are restructured and changes to the high cost and rural telephone company support components of Universal Service are implemented; and,
- July 1, 1998 when the final components of the Universal Service proposals are fully implemented and the next step of access charge reductions takes place.

Finally, the attached Appendices provide detailed spread sheets and notes containing the basic data and company specific impacts for the changes implemented on July 1, 1997, on January 1, 1998, and on July 1, 1998.

Although this joint AT&T/Bell Atlantic/NYNEX proposal is comprehensive, the parties were unable to reach an agreement on the ultimate level of high cost universal service support for large LECs. In addition, the parties have not agreed to the structure of price cap regulation beyond those recommendations described within this proposal or the levels of access prices beyond January 1, 1998.

04/44/07

ATT/Bell Atlantic/NYNEX Proposal

Plan Highlights

| • | National Universal Service Fund | | \$5.36B |
|---|---|---|---------|
| | Maintains and expands support for rural LECs Existing high cost Existing long term support Existing DEM weighting support New access rate disparity support Total | .450B .410B .375B <u>.500B</u> \$1.735B | |
| | Supports new funds Education Healthcare Expanded Lifeline & Link-up Total | 2.250B .400B <u>.650B</u> \$3.300B | |
| | ♦ Continues support for Large Companies | \$.325B | |
| • | Explicit LEC collection mechanism for "Universal Service for America" contribution | | \$1.4B |
| • | Per MOU access rate decrease | | 49% |
| • | Long distance toll reductions | | \$2.1B |
| • | Total cumulative ('97 - '98) consumer savings | | \$900M |

ATT/Bell Atlantic/NYNEX Proposal Summary of Revenue Reductions July 1, 1997 and Cumulative Through July 1, 2001

(\$ millions)

| Company | July 1, 1997 Reduction | Remaining Non-Service Related TIC Calculated Jan. 1, 1998 * | July 1, 1998 PC Reduction @ 5.3% or 25% of Non-Service Related TIC ** | Est. Total Reduction through July 1, 2001 |
|------------------|---------------------------|---|---|--|
| Ameritech | \$363 | \$0 | \$56 | \$587 |
| Bell Atlantic | \$98 | \$210 | \$75 | \$396 |
| NYNEX | \$156 | \$367 | \$97 T | \$545 |
| Bell South | \$404 | \$0 | \$77 | \$711 |
| SBC | \$64 | \$129 | \$53 | \$277 |
| Pacific Tel. | \$281 | \$0 | \$39 | \$435 |
| US West | \$152 | \$244 | \$65 T | \$410 |
| GTE | \$462 | \$0 | \$ 61 | \$704 |
| Sprint | \$182 | \$0 | \$23 | \$273 |
| All Others | \$55 | \$25 | \$17 | \$123 |
| Total Reductions | \$2,216 | | \$561 | \$4,461 |

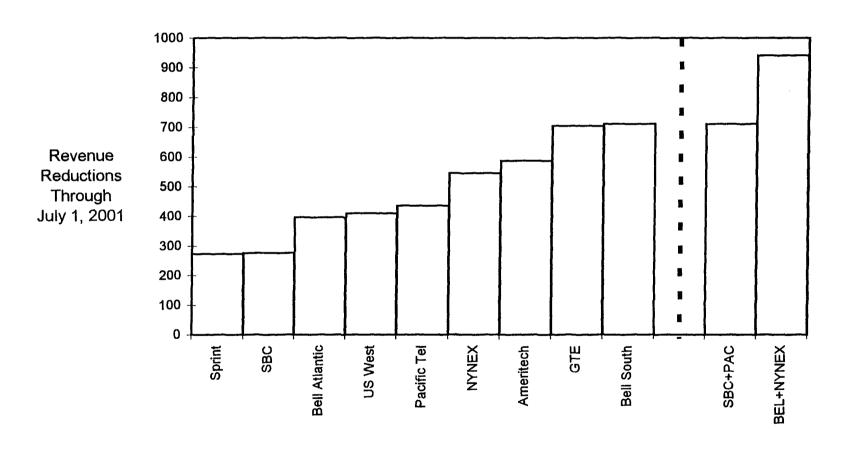
^{*} Derived by estimating service related TIC at 20% of total TIC

^{**} For illustrative purposes, assumed price cap filing at 5.3% productivity and GDPPI of 2.7%

⁽T) Indicates that 25% of non-service related TIC is greater than price cap reduction at 5.3%

ATT/Bell Atlantic/NYNEX Proposal Summary of Estimated Total Revenue Reductions For Large Price Cap Companies

(\$ millions)



ATT/Bell Atlantic/NYNEX Proposal Summary of Average Minute of Use Rates

| Company | Current | July 1, 1997 | Jan. 1, 1998 | _July 1, 1998 * |
|-----------------------------------|---------|--------------|--------------|-----------------|
| Ameritech | \$0.024 | \$0.016 | \$0.010 | \$0.009 |
| Bell Atlantic | \$0.021 | \$0.018 | \$0.013 | \$0.011 |
| NYNEX | \$0.035 | \$0.031 | \$0.025 | \$0.023 |
| Bell South | \$0.026 | \$0.019 | \$0.013 | \$0.011 |
| SBC | \$0.024 | \$0.021 | \$0.015 | \$0.013 |
| Pacific Tel. | \$0.022 | \$0.012 | \$0.008 | \$0.007 |
| US West | \$0.026 | \$0.023 | \$0.018 | \$0.016 |
| GTE | \$0.038 | \$0.025 | \$0.018 | \$0.017 |
| Sprint | \$0.032 | \$0.020 | \$0.014 | \$0.013 |
| Average rate (all Price Cap LECs) | \$0.027 | \$0.021 | \$0.015 | \$0.014 |
| % Decr. from Current | Rate | -23% | -44% | -49% |

^{*} For illustrative purposes, assumed price cap filing at 5.3% productivity and GDPPI of 2.7%.

Universal Service (\$ millions)

As of July 1, 1997

| <u>Fund</u> | Total <u>Proposed</u> | IXCs <u>Current</u> | IXCs <u>Proposed</u> | IXCs <u>Changes</u> | LECs Proposed | All Others Proposed |
|--|--------------------------|------------------------|-------------------------|------------------------|------------------|------------------------|
| National Services: Schools and Libraries (1) Rural Health Care | 1,125.0 | - | 479.3 - | 479.3 - | 532.1 - | 113.6 |
| Lifeline, Linkup Subtotal | <u>180.0</u> 1,305.0 | <u>180.0</u> 180.0 | <u>180.0</u> 659.3 | 479.3 | 532.1 | 113.6 |
| High Cost: Rural LECs | 1,735.0 | 1,735.0 | 1,735.0 | - | - | - |
| High Cost: Large LECs | 325.0 | 325.0 | 325.0 | | | • |
| Total | 3,365.0 | 2,240.0 | 2,719.3 | 479.3 | 532.1 | 113.6 |
| Access Flow Back | - | - | - | - | - | - |

⁽¹⁾ Schools and libraries funding phased-in to reach \$2,250M on 1/1/98.

Universal Service (\$ millions)

As of January 1, 1998

| <u>Fund</u> | Total <u>Proposed</u> | IXCs <u>Current</u> | IXCs <u>Proposed</u> | IXCs <u>Change</u> | LECs <u>Proposed</u> | All Others <u>Proposed</u> |
|-------------------------------|--------------------------|------------------------|-------------------------|-----------------------|-------------------------|-------------------------------|
| National Services: | | | | | | |
| Schools and Libraries | 2,250.0 | - | 958.5 | 958.5 | 1,064.3 | 227.2 |
| Rural Health Care (1) | 150.0 | _ | 63.9 | 63.9 | 70.9 | 15.2 |
| Lifeline, Linkup (2) | <u>380.0</u> | <u> 180.0</u> | <u>161.9</u> | <u>(18.1)</u> | <u> 179.7</u> | <u>38.4</u> |
| Subtotal | 2,780.0 | 180.0 | 1,184.3 | 1,004.3 | 1,314.9 | 280.8 |
| High Cost: Rural LECs | | | | | | |
| Existing high cost | 450.0 | 450.0 | 356.0 | (94.0) | 57.1 | 36.9 |
| Existing long term support | 410.0 | 410.0 | 324.3 | (85.7) | 52.1 | 33.6 |
| Existing DEM weighting | 375.0 | 375.0 | 296.6 | (78.4) | 47.6 | 30.8 |
| New access rate disparity | <u>500.0</u> | <u>500.0</u> | <u>395.5</u> | (104.5) | <u>63.5</u> | <u>41.0</u> |
| Subtotal | 1,735.0 | 1,735.0 | 1,372.4 | (362.6) | 220.3 | 142.3 |
| High Cost: | | | | | | |
| Large LECs | 325.0 | 325.0 | 257.1 | (67.9) | 41.3 | 26.6 |
| Total | 4,840.0 | 2,240.0 | 2,813.8 | 573.8 | 1,576.5 | 449.7 |
| Access Flow Back | - | | 31.8 | 31.8 | (31.8) | - |

⁽¹⁾ Start-up commences at \$150M and increases to \$400M on 1/1/99.

⁽²⁾ Assumes 6M lifeline customers 1/1/98, 8M by 7/1/98 and 10M by 1/1/99.

Universal Service (\$ millions)

As of July 1, 1998

| <u>Fund</u> | Total <u>Proposed</u> | IXCs <u>Current</u> | IXCs <u>Proposed</u> | IXCs <u>Changes</u> | LECs <u>Proposed</u> | All Others <u>Proposed</u> |
|----------------------------|--------------------------|------------------------|-------------------------|------------------------|-------------------------|-------------------------------|
| National Services: | | | | | | |
| Schools and Libraries | 2,250.0 | - | 958.5 | 958.5 | 1,064.3 | 227.2 |
| Rural Health Care | 250.0 | _ | 106.5 | 106.5 | 118.2 | 25.3 |
| Lifeline, Linkup | <u>525.0</u> | <u> 180.0</u> | <u>223.7</u> | <u>43.7</u> | <u>248.3</u> | <u>53.0</u> |
| Subtotal | 3,025.0 | 180.0 | 1,288.7 | 1,108.7 | 1,430.8 | 305.5 |
| High Cost: Rural LECs | | | | | | |
| Existing high cost | 450.0 | 450.0 | 356.0 | (94.0) | 57.1 | 36.9 |
| Existing long term support | 410.0 | 410.0 | 324.3 | (85.7) | 52.1 | 33.6 |
| Existing DEM weighting | 375.0 | 375.0 | 296.6 | (78.4) | 47.6 | 30.8 |
| New access rate disparity | <u>500.0</u> | <u>500.0</u> | <u>395.5</u> | (104.5) | <u>63.5</u> | <u>41.0</u> |
| Subtotal | 1,735.0 | 1,735.0 | 1,372.4 | (362.6) | 220.3 | 142.3 |
| High Cost: | | | | | | |
| Large LECs | 325.0 | 325.0 | 257.1 | (67.9) | 41.3 | 26.6 |
| Total | 5,085.0 | 2,240.0 | 2,918.2 | 678.2 | 1,692.4 | 474.4 |
| Access Flow Back | - | - | 31.8 | 31.8 | (31.8) | - |

ATT/Bell Atlantic/NYNEX Proposal Universal Service/Access Reform Implementation Schedule

Overall, the Universal Service proposal will accomplish the following:

- Maintain support for rural LECs
- Maintain existing high cost support and funding for large LECs
- Each carrier's contribution to the high cost funds described above will be determined as a percentage of interstate retail charges.
- Establish a National Services Fund that, when fully implemented, includes the following components and amounts:
 - \$2.25B for schools and libraries that implements the Joint Board recommendation based upon the Telecommunications Act of 1996.
 - Approximately \$400M for discounted services to rural not-for-profit health care providers.
 - Approximately \$650M to support expanded Lifeline and Link-up programs in all states.
 - The components of this National Services Fund total approximately \$3.3B.
 - Each carrier's obligation to the Fund is determined as a percentage of interstate and intrastate retail revenues. The LEC recovers its assessment, however, entirely through interstate retail rates.
 - Mechanisms need to be developed to insure that no segment of the telecommunications industry, either wireline or wireless, pay more than their fair share to these funds.
- The LEC obligation for the National Services Fund and rural high cost will be recovered in the following manner:
 - A "Universal Service for America" contribution from all end users on a per line basis. The residential portion of this charge will be implemented in three phases consistent with the timing of the overall funding requirements. The residential charge will be phased-in beginning at \$.25 on July 1, 1997, with increases of \$.25 on January 1, 1998 and July 1, 1998. The business per line contribution will be set at an amount to make up the difference in the funding requirements. On average this equals \$.75. Both residential and business charges will be decreased after the wiring of the schools and libraries is concluded.
 - Additional funding obligations from toll will be recovered by an exogenous adjustment to the interexchange basket.
 - The additional funding obligations from special access purchased by end users would be recovered, at the company's option, through a separate mechanism outside of price caps applicable to end users only.

Effective July 1, 1997:

Universal Service

- Maintain support for rural LECs
 - The existing high cost fund support for small LECs
 - The existing Long Term Support for small LECs
 - The existing DEM Weighting support for small LECs
- Maintain existing high cost support and funding for large LECs
- Establish a National Services Fund:

Begin implementation of education component of the fund at an annual level of \$1.125B;

Existing \$180M Lifeline and Link-up support continues.

- Recovery for the National Services Fund will begin:
 - "Universal Service for America" contribution initial level for residence users of \$.25.
 - The business per line contribution will be set at an amount to make up the difference in the funding requirements. On average this equals \$.75.
 - Additional funding obligations from toll will be recovered by an exogenous adjustment to the interexchange basket.
 - The additional funding obligations from special access purchased by end users would be recovered, at the companies option, through a separate mechanism outside of price caps applicable to end users only.

Access Reform

- To implement the new access structure, LECs will first set all price cap indices (PCI) equal to actual price indices (API) and equal to service band indices (SBI).
- The TIC will be removed from the transport basket and established as a separate basket.
- Each LEC determines its access rate reduction for July 1 in the following way:
 - 1. Determine the revenue reduction resulting from using the current Price Cap Rules.
 - 2. Determine the revenue reduction required to reduce the TIC by 20% (first step of five year phase out).
 - 3. Determine the revenue reduction required to reinitialize rates to a 11.25% ROR.
 - 4. The LEC access rate reduction is the greatest of the above three calculations.

- All reductions applied to reduce the TIC rate element (up to 80% of total TIC pending FCC determination of "service-related" TIC costs). Any excess reduction is applied to the CCL.
- Increase the cap on Single Line Business SLC from \$3.50 to \$6.00 and increase the cap on Multiline Business SLC from \$6 to \$8 and reduce CCL.
 These rates will increase from their current levels to the lower of cost or the cap.
- After reductions all PCIs set equal to APIs and SBIs.
- To determine price cap productivity, the Commission should review the effects of market place and rate structure changes.
- No changes to separations cost allocations or on the basis of demand stimulation.

Effective January 1, 1998:

Universal Service

- Establish a Rural Local Exchange Company Fund for rural LECs that includes the following components:
 - The existing high cost fund support for small LECs
 - The existing Long Term Support for small LECs
 - The existing DEM Weighting support for small LECs
 - New support designed to reduce the disparity between the access charges of rural LECs and large companies.
 - This fund would be approximately \$1.735B. Funding obligations for this fund would be assessed to carriers based upon their share of total interstate retail revenues
- Expand the National Services Fund as follows:
 - Fully fund the \$2.25B for schools and libraries (increase of \$1.125B).
 - Of the approximately \$400M for discounted services to rural not-forprofit health care providers, funding of \$150M would begin on January 1, 1998
 - Of the approximately \$650M to support expanded Lifeline and Link-up programs, funding of \$380M would also begin on January 1, 1998 based upon an estimate of 6M Lifeline customers (increase of \$200M). The Lifeline fund would support the \$3.50 SLC charge, the \$.50 "Universal Service for America" contribution. The fund would also allow LECs to forgo charging the \$1.00 residential PSL charge to carriers.
- Increase the "Universal Service for America" contribution for residence end users to \$.50 on January 1, 1998.

- Establish a high cost fund for large LECs that serve costly geographic
 markets would be established. This would amount to approximately \$325M,
 equivalent to the current level of high cost funding provided to large LECs.
 - Funding obligations for this fund would be assessed to carriers based upon their share of total interstate retail revenues. LECs would collect their obligation based upon total interstate revenues (subject to SLC caps). As such, a portion of the LEC obligation would flow back to the IXCs through carrier access charges.

Access Reform

- Establish a Presubscribed Line Charge (PSL) billed to interexchange carriers. Cap the PSL charge at \$1 for residence lines and \$2 for business lines. Target reductions to cover non-traffic sensitive (NTS) costs of CCL and then local switching rate elements.
 - PSL charge is an average charge per holding company.
 - If NTS costs are less than caps, retain the 2 to 1 ratio of business to residence PSL charges.
- FCC completes definition of "service-related" components of TIC and initiates transition period to appropriate rate elements.
- The existing interim transport rate structure should be continued.
- Collapse the current common line and switching baskets into a single basket subject to switching basket PCI.
- Combine the LS, Information Surcharge, and any residual CCL into a single usage rate.
- Require that the terminating access rate be no higher than the originating access rate for all carriers.
- With the opening of local exchange markets to increased competition, the Commission should consider the appropriateness of additional pricing flexibility for ILECs under the new price cap structure that should also be effective January 1, 1998.

Effective July 1, 1998:

Universal Service

- Expand the National Services Fund as follows:
 - Of the approximately \$400M for discounted services to rural not-forprofit health care providers, funding would increase to \$250M (increase of \$100M).

- Of the approximately \$650M to support expanded Lifeline and Link-up programs, funding would increase to \$525M based upon an estimate of 8M Lifeline customers (increase of \$145M).
- Increase the "Universal Service for America" contribution for residence end users to \$.75.

Access Reform

 Continue phase-out of the remaining TIC over four years by targeting all reductions to the TIC. Amount of reduction determined by taking the greater of 25% of TIC on January 1, 1998, or the annual reduction calculated using price cap rules.

July 1, 1999 - July 1, 2001:

Universal Service

- The National Service Fund would increase to anticipated full participation levels.
- The "Universal Service for America" contribution would decrease after wiring of schools and libraries is concluded.

Access Reform

Phase-out of remaining TIC continues.

Summary of AT&T/Bell Atlantic/NYNEX Proposal IXC Annual Impact as of 1/1/98

Access Reductions

"Triple Play" By Company

(P-Cap, 20% TIC, Reinitialization to 11.25%)

(2,200) Higher of the three possibilities

Restructures

Increased SLCs

Total Restructures

(370) Cap raised to \$6 for Single Line Business, \$8 for Multi Line

"PSL" line charges from LECs*

LEC reduction in usage-based access charges

(440)

2.362

(2,432)

(1,735)

High cost Component of New USF

Small, rural LECs:

LTS (410)

DEM (375)

Old High cost (450)

Access Differential (500) Permits Rural Cos to equalize their rates with large LECs

Total Small, rural LECs High Cost

Large LECs High Cost (325)

Total High Cost (2,060)

Other Reductions

Removal of Existing Lifeline charge

(per line from NECA) (181)

Total IXC Impact before New USF

(4,881)

New USF

New money for National Services

Schools & Libraries

2,250

Rural Health Care

150

Lifeline, Link-up
Total before assessments

380 2,780

IXCs assessed 42.6% of National Services

1,184 Assessment based on total retail revenues

IXCs assessed 79.1% of new high cost fund

1,629 Assessment based on interstate retail revenues

Total New USF charges to IXCs

2,814

Access "Flowback" charged to iXCs

32 Covers LEC obligation for large LEC high cost (above SLC caps)

Net IXC revenue impact

(2,036)

^{*}Excludes line charges associated with Lifeline customers

Summary of AT&T/Bell Atlantic/NYNEX Proposal Universal Service Funding & Assessment

| | 7/1/97 | 1/1/98 | 7/1/98 | <u>Total</u> |
|---|------------------|--------|--------|--------------|
| 1. High Cost Fund | | | | |
| Large LECs | | 325 | | 325 |
| Small, rural LECs: | | | | |
| LTS | | 410 | | 410 |
| DEM | | 375 | | 375 |
| Old High cost | | 450 | | 450 |
| Access Differential | | 500 | | 500 |
| Total High Cost | | 2,060 | | 2,060 |
| 2. National Services (New Money) | | | | |
| Schools & Libraries | 1,125 | 1,125 | | 2,250 |
| Rural Health Care | | 150 | 100 | 250 |
| Lifeline, Link-up | | 380 | 145 | 525 |
| Total National Services | 1,125 | 1,655 | 245 | 3,025 |
| 3. Total New Universal Service Fund | 1,125 | 3,715 | 245 | 5,085 |
| 4. Assessment of New Universal Service Fund o | n Retail Re | venues | | |
| High Cost Fund Payments (assessed on Inters | state revenu | es) | | |
| IXCs | - | 1,629 | - | 1,629 |
| LECs | - | 262 | - | 262 |
| Other | - | 169 | - | 169 |
| Total | - | 2,060 | - | 2,060 |
| National Services Payments (assessed on total | al revenues) | | | |
| IXCs | 479 [°] | 705 | 104 | 1,289 |
| LECs | 532 | 783 | 116 | 1,431 |
| Other | 114 | 167 | 25 | 306 |
| Total | 1,125 | 1,655 | 245 | 3,025 |
| Total NUSF | | | | |
| IXCs | 479 | 2,334 | 104 | 2,918 |
| LECs | 532 | 1,044 | 116 | 1,692 |
| Other | 114 | 336 | 25 | 474 |
| Total | 1,125 | 3,715 | 245 | 5,085 |

Summary of AT&T/Bell Atlantic/NYNEX Proposal IXC Impacts

| | Annual Expense Change (\$M) as of: | | | |
|--|------------------------------------|----------|--------|--------------|
| | 7/1/97 | 1/1/98 | 7/1/98 | <u>Total</u> |
| Access Reductions | | | | |
| "Triple Play" By Company | | | | |
| (P-Cap, 20% TIC, Reinitialization to 11.25%) | (2,200) | - | (561) | (2,761) |
| Restructures | • | | | • • |
| Increased SLCs | (370) | | | (370) |
| "PSL" Line charges from LECs* | - | 2,362 | (27) | 2,335 |
| LEC reduction in usage-based access charges | - | (2,432) | - | (2,432) |
| Sub Total | (370) | (70) | (27) | (467) |
| Removal of New USF Components | | | | |
| New High Cost fund | 0 | (2,060) | 0 | (2,060) |
| Other Reductions | | | | |
| Removal of Existing Lifeline charge | | | | |
| (per line from NECA) | | (181) | | (181) |
| Payment of "Access Flowback" to LECs | _ | 32 | _ | 32 |
| Sub Total | 0 | (149) | 0 | (149) |
| Total Access Charge Reform Before New USF | (2,570) | (2,279) | (588) | (5,437) |
| 3 | (=,0.0) | (=,=: 0) | (000) | (0, .0.) |
| IXC New USF Payments | 479 | 2,334 | 104 | 2,918 |
| Net iXC Impact | (2,091) | 55 | (483) | (2,519) |

^{*}Excludes line charges associated with Lifeline customers

Summary of AT&T/Bell Atlantic/NYNEX Proposal LEC Impacts

| | Annual Revenue Change (\$M) as of: | | | |
|--|------------------------------------|---------|--------|--------------|
| • | 7/1/97 | 1/1/98 | 7/1/98 | <u>Total</u> |
| Access Reductions | | | | |
| "Triple Play" By Company | | | | |
| (P-Cap, 20% TIC, Reinitialization to 11.25%) | (2,200) | | (561) | (2,761) |
| Restructures | | | | |
| Increased SLCs | 370 | | | 370 |
| SLC reduction in usage rates | (370) | - | - | (370) |
| "PSL" Line charges to IXCs | (010) | 2,362 | (27) | 2,335 |
| IXC usage reduction to offset line charges | | (2,432) | (=;) | (2,432) |
| Sub Total | 0 | (70) | (27) | (97) |
| New USF Components | | | | |
| Lifeline Receipts from New USF | | 380 | 145 | 525 |
| Lifeline Discounts to End Users | - | (310) | (118) | (428) |
| Access "Flowback" Revenue from IXCs | | 32 | | 32 |
| Sub Total | 0 | 102 | 27 | 129 |
| LEC New USF Payments | 532 | 1,044 | 116 | 1,692 |
| · | | | | |
| National Services Collections | 532 | 1,013 | 116 | 1,661 |
| LEC Net Impact | (2,200) | 0 | (561) | (2,761) |

Summary of AT&T/Bell Atlantic/NYNEX Proposal Customer Impacts* (Telephone Bill)

Annual Impacts (\$M) as of:

| | Annual impuoto (vivi) as of: | | | | | |
|---|------------------------------|--------|--------|--------------|--|--|
| | 7/1/97 | 1/1/98 | 7/1/98 | <u>Total</u> | | |
| Change in IXC toll charges | (2,091) | 55 | (483) | (2,519) | | |
| Increased SLCs | 370 | | | 370 | | |
| LEC Charges for National Services | 532 | 1,013 | 116 | 1,661 | | |
| Total IXC and Local Telephone Customer Impact | (1,189) | 1,068 | (368) | (488) | | |

Calendar Year Impacts

| <u> 1997</u> | <u>1998</u> | <u>Cumulative</u> |
|--------------|-------------|---------------------------------|
| (594) | (1,189) | (1,783) |
| | 1,068 | 1,068 |
| | (184) | (184) |
| (594) | (305) | (899) |
| | ` , | (594) (1,189) 1,068 (184) |

^{*}Excluding benefits of Rural Health Care and Schools & Libraries () denotes customer savings

ATT/Bell Atlantic/NYNEX Proposal Company Specific Data

| 1996 Annual | | | | | | | | |
|---------------------|------------------|------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|---------------|
| Filing Data | <u>Ameritech</u> | BA | NYNEX | BS. | SBC | PAC | usw | Citizens |
| Revenue | | | | | | | | |
| LS | \$394,276,915 | \$426,465,960 | \$711,986,957 | \$467,482,365 | \$275,685,659 | \$291,046,991 | \$397,263,637 | \$33,925,468 |
| CCL | \$224,768,716 | \$339,530,481 | \$363,494,101 | \$686,414,764 | \$262,976,975 | \$176,565,259 | \$272,253,403 | \$48,449,247 |
| TIC | \$321,854,857 | \$362,551,430 | \$616,496,794 | \$272,858,095 | \$228,227,152 | \$128,985,231 | \$466,260,140 | \$24,474,785 |
| IS | \$7,337,827 | \$27,660,188 | \$0 | \$19,910,725 | \$17,677,315 | \$3,642,253 | \$14,285,032 | \$1,427,957 |
| Sw Trans | \$117,228,627 | \$124,977,992 | \$118,372,022 | \$169,790,758 | \$84,352,189 | \$89,301,311 | \$125,908,844 | \$9,368,136 |
| Total Usage Revenue | \$1,065,466,942 | \$1,281,186,051 | \$1,810,349,874 | \$1,616,456,707 | \$868,919,290 | \$689,541,045 | \$1,275,971,056 | \$117,645,593 |
| Remaining Traffic | | | | · | | | | |
| Sensitive | \$28,793,674 | \$43,024,840 | \$42,787,240 | \$58,677,024 | \$33,801,527 | \$21,525,391 | \$38,467,843 | \$2,197,724 |
| Special Access | \$374,121,910 | \$437,371,381 | \$374,814,224 | \$446,959,565 | \$398,051,723 | \$270,854,738 | \$306,510,101 | \$12,139,445 |
| <u>IX</u> | \$75,212,649 | \$117,508,008 | \$21,353,449 | \$29,067,615 | \$34,171,401 | \$210,111 | \$49,805,110 | \$0 |
| EUCL Revenue | \$840,857,159 | \$940 <u>.543</u> .107 | \$815,268,488 | \$1,007,588,742 | \$676,552,740 | \$725,116,227 | \$695,258,426 | \$36,778,968 |
| Total Interstate | | | | | | | | |
| Access Revenue | \$2,384,452,334 | \$2,819,633,387 | \$3,064,573,275 | \$3,158,749,653 | \$2,011,496,681 | \$1,707,247,512 | \$2,366,012,536 | \$168,761,730 |
| MOUs | 44,748,785,859 | 61,606,020,361 | 51,489,150,878 | 61,878,991,467 | 35,575,273,898 | 31,681,398,918 | 48,397,990,585 | 2,113,072,617 |
| Average MOU Rate | \$0.0238 | \$0.0208 | \$0.0352 | \$0.0261 | \$0.0244 | \$0.0216 | \$0.0264 | \$0.0557 |

ATT/Bell Atlantic/NYNEX Proposal Company Specific Data

| 1996 Annual Filing Data | <u>gte</u> | Allant (Lincoln) | Frontier (Rochester) | SNET | <u>Sprint</u> | <u>Total</u> | BOCs |
|---------------------------------|-----------------|----------------------|-------------------------|---------------|-----------------|------------------|------------------|
| Revenue | \$536,457,523 | \$8,567,817 | \$39,572,177 | \$92,293,550 | \$197,489,775 | \$3,872,514,794 | \$2,964,208,484 |
| LS | | | | | | | |
| CCL | \$704,580,496 | \$949,798 | \$18,688,458 | \$41,560,124 | \$234,322,444 | \$3,374,554,266 | \$2,326,003,699 |
| TIC | \$183,487,975 | \$5,017,615 | \$7,145,464 | \$40,271,814 | \$88,835,638 | \$2,746,466,990 | \$2,397,233,699 |
| is | \$47,200,634 | \$240,542 | \$515,616 | \$7,841,307 | \$4,656,947 | \$152,396,343 | \$90,513,340 |
| Sw Trans | \$101,489,753 | \$2,374,182 | \$6,398,148 | \$19,736,076 | \$49,417,917 | \$1.018.715.955 | \$829,931,743 |
| Total Usage Revenue | \$1,573,216,381 | \$17,149,954 | \$72,319,863 | \$201,702,871 | \$574,722,721 | \$11,164,648,348 | \$8,607,890,965 |
| Remaining Traffic Sensitive | \$18,393,219 | \$401,934 | \$899,060 | \$2,020,263 | \$10,743,545 | \$301,733,284 | \$267,077,539 |
| Special Access | \$216,674,219 | \$3,290,842 | \$13,719,929 | \$47,082,984 | \$113,884,664 | \$3,015,475,725 | \$2,608,683,642 |
| ix | \$27,869,040 | \$33,997 | \$0 | \$0 | \$6,708,260 | \$361,939,640 | \$327,328,343 |
| EUCL Revenue | \$782.618.775 | \$11,041,741 | \$38,478,798 | \$95,592,802 | \$302,779,682 | \$6,968,475,655 | \$5,701,184,889 |
| Total Interstate Access Revenue | \$2,618,771,634 | \$ 31,918,468 | \$125,417,650 | \$346,398,920 | \$1,008,838,872 | \$21,812,272,652 | \$17,512,165,378 |
| MOUs | 41,686,756,188 | 616,719,940 | 2,163,954,744 | 7,296,297,240 | 18,245,172,774 | 407,499,585,469 | 335,377,611,986 |
| Average MOU Rate | \$0.0377 | \$0.0278 | \$0.0334 | \$0.0276 | \$0.0315 | \$0.0274 | \$0.0257 |

ATT/Bell Atlantic/NYNEX Proposal Company Specific Data

| | | | | | <u> </u> | T | <u> </u> | | |
|------------------------------|------------------|------------------------|-----------------|-----------------|-----------------|-----------------|-----------------------|-----------------|-----------------------|
| 7/1/97 | | | | | | | | | |
| | <u>Ameritech</u> | BA | NYNEX | <u>BS</u> | SBC | PAC | <u>usw</u> | <u>Citizens</u> | GTE |
| Forecast Revenue | | | | | | | | | |
| LS | \$417,933,530 | \$452,053,918 | \$754,706,174 | \$495,531,307 | \$292,226,799 | \$308,509,810 | \$421,099,455 | \$35,960,996 | \$ 568,644,974 |
| CCL - Payphone | \$238,254,839 | \$313,563,487 | \$338,940,498 | \$727,599,650 | \$239,672,045 | \$158,878,689 | \$270,428,740 | \$50,253,157 | \$746,169,510 |
| TIC | \$341,166,148 | \$384,304,516 | \$653,486,602 | \$289,229,581 | \$241,920,781 | \$136,724,345 | \$494,235,748 | \$25,943,272 | \$194,497,254 |
| IS | \$7,778,097 | \$29,319,799 | \$0 | \$21,105,369 | \$18,737,954 | \$3,860,788 | \$15,142,134 | \$1,513,634 | \$50,032,672 |
| Sw Trans | \$117,228,627 | \$124.977.992 | \$118,372,022 | \$169,790,758 | \$84,352,189 | \$89,301,311 | \$125,908,844 | \$9,368,136 | \$101.489.753 |
| Total Usage Revenue | \$1,122,361,241 | \$1,304,219,712 | \$1,865,505,296 | \$1,703,256,664 | \$876,909,767 | \$697,274,943 | \$1,326,814,922 | \$123,039,195 | \$1,660,834,163 |
| Remaining Traffic | | | | | | | | | |
| Sensitive | \$30,521,294 | \$45,606,330 | \$45,354,474 | \$62,197,645 | \$35,829,619 | \$22,816,914 | \$40,775,914 | \$2,329,587 | \$19,496,812 |
| Special Access | \$396,569,225 | \$463,613,664 | \$397,303,077 | \$473,777,139 | \$421,934,826 | \$287,106,022 | \$324,900,707 | \$12,867,812 | \$229,674,672 |
| <u>IX</u> | \$79,725,408 | \$124,558 <u>,</u> 488 | \$22,634,656 | \$30,811,672 | \$36,221,685 | \$222,718 | \$ 52,793,417 | \$0 | \$29,541,182 |
| EUCL Revenue | \$866,082,874 | \$968,759,400 | \$839,726,543 | \$1,037,816,404 | \$696,849,322 | \$746.869.714 | \$ 716,116,179 | \$37.882.337 | \$806,097,338 |
| Total Interstate Access | | | | | | | | | |
| Revenue | \$2,495,260,042 | \$2,906,757,594 | \$3,170,524,047 | \$3,307,859,524 | \$2,067,745,219 | \$1,754,290,311 | \$2,461,401,138 | \$176,118,932 | \$2,745,644,168 |
| Forecast MOUs (6% Growth) | 47,433,713,011 | 65,302,381,583 | 54,578,499,931 | 65,591,730,955 | 37,709,790,332 | 33,582,282,853 | 51,301,870,020 | 2,239,856,974 | 44,187,961,559 |
| Adjustments | | | | | | | | | |
| TIC 20% | \$68,233,230 | \$76,860,903 | \$130,697,320 | \$57,845,916 | \$48,384,156 | \$27,344,869 | \$98,847,150 | \$5,188,654 | \$38,899,451 |
| Represcrip @ 11.25 | \$362,994,000 | \$4,462,000 | \$155,930,000 | \$403,590,000 | \$20,214,000 | \$280,903,000 | \$151,629,000 | \$20,035,000 | \$461,691,000 |
| PC @ 5.3% | \$112,500,000 | \$97.842.239 | \$90,433,531 | \$42,699,672 | \$64,126,514 | \$47,233,029 | \$146,420,212 | \$5,380,124 | \$83,486,440 |
| Maximum | \$362,994,000 | \$97,842,239 | \$155,930,000 | \$403,590,000 | \$64,126,514 | \$280,903,000 | \$151,629,000 | \$20,035,000 | \$461,691,000 |
| ML @ CAP | \$0 | \$0 | \$0 | \$68,206,666 | \$0 | \$0 | \$0 | \$2,969,080 | \$74,523,823 |
| SL Bus to \$6.00 | \$10,409,021 | \$8,955,400 | \$16,300,186 | \$15,168,051 | \$8,563,305 | \$5,780,189 | \$8,907,564 | \$0 | \$13.823.274 |
| Total | \$10,409,021 | \$8,955,400 | \$16,300,186 | \$83,374,717 | \$8,563,305 | \$5,780,189 | \$8,907,564 | \$2,969,080 | \$88,347,097 |
| Adjusted Revenues | | | | | | | | | |
| Usage Revenue | \$748,958,220 | \$1,197,422,073 | \$1,693,275,110 | \$1,216,291,947 | \$804,219,948 | \$410,591,754 | \$1,166,278,358 | \$100,035,115 | \$1,110,796,066 |
| EUCL Rev | \$876,491,895 | \$977,714,800 | \$856,026,729 | \$1,121,191,121 | \$705,412,627 | \$752,649,903 | \$725,023,743 | \$40,851,417 | \$894,444,435 |
| Per Line Rev | <u>\$0</u> | <u>\$0</u> | <u>\$0</u> | <u>\$0</u> | <u>\$0</u> | <u>\$0</u> | \$0 | \$0 | <u>\$0</u> |
| Total Adjusted Revenues | \$1,625,450,115 | \$2,175,136,873 | \$2,549,301,839 | \$2,337,483,068 | \$1,509,632,575 | \$1,163,241,657 | \$1,891,302,101 | \$140,886,532 | \$2,005,240,501 |
| | | | | | | | | | |
| Average MOU Rate | \$0,0158 | \$0,0183 | \$0,0310 | \$0.0185 | \$0.0213 | \$0.0122 | \$0.0227 | \$0.0447 | \$0.0251 |